



July 2, 2012

To: Carol Mortensen, Director
CalRecycle
1001 I Street, PO Box 4025
Sacramento, CA 95812-4025

Comments on "California's New Goal: 75% Recycling Plan"

Dear Ms Mortensen:

The Los Angeles Area Regional Agency (LARA) is a joint powers authority comprised of 17 cities within Los Angeles County with a shared responsibility for implementing programs to meet and exceed the 50% disposal per capita requirements of AB939, as modified by SB 1016. LARA was approved by the CIWM Board in 2004. Since that time, our member cities have continued to establish and improve landfill diversion programs. Our agency model provides an alternative providing local jurisdictions the ability to retain authority when it comes to their solid waste and recycling programs, and franchise agreements, but still work together on a voluntary basis to pool reporting costs and work on joint programs.

The LARA members appreciate the opportunity to work with CalRecycle in crafting the next phase of landfill diversion policies to reach 75% by 2020. On June 21, 2012, the LARA Board approved a motion that allows me to submit the following comments on their behalf. The Board expressed concern about the potential cost of new programs on local jurisdictions, as the enforcement responsibility for some is unclear. Jurisdictions are struggling to keep current diversion programs operating during these difficult times.

While many LARA member cities are seeking to increase organics diversion programs, the LARA Board opposes removing currently allowed methods of diversion such as Alternative Daily Cover (ADC) and transformation credits when calculating progress towards the 75% goal. Several Board members pointed out the difficulty in moving materials to organics markets due to the limited competition in Los Angeles County at this time.

The LARA Board supports Extended Producer Responsibility (EPR) and Source Reduction activities, to reduce waste while reducing local jurisdiction costs to collect and manage materials. LARA also supports streamlining the production and approval of planning documents, which will also save scarce funds for recycling programs.

LARA opposes measurement of AB939/AB341 compliance at the County level. Regional agencies around the State of California have varying memberships due to their own unique circumstances. Not all agencies are Countywide organizations. LARA is a consortium of communities that are voluntarily pooling resources to work together on waste reduction and recycling together. LARA requests that Regional Agencies continue to be measured as a single, separate entity from the County of Los Angeles.

Last, the LARA Board requests that, if working groups are established to provide input on potential policies during the development of the CalRecycle report back to the Legislature in January 2014, a LARA representative be invited as a local government participant. Development and implementation of this plan are of significant interest to the LARA members. Please contact me at karen.coca@lacity.org, or Nady Maechling at nady.maechling@lacity.org, if you have any questions.

Sincerely

Karen Coca
Executive Director

Artesia

Beverly Hills

Bradbury

Duarte

Hermosa Beach

Hidden Hills

Los Angeles

Lynwood

Manhattan Beach

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Rancho Palos Verdes

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